

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**IN RE: BLUE CROSS BLUE SHIELD
ANTITRUST LITIGATION
(MDL No. 2406)**

Master File No. 2:13-cv-20000-RDP

**This document relates to the Provider
Track cases.**

**JOINT MOTION FOR ENTRY OF STIPULATION AND PROPOSED ORDER
GOVERNING THE TAKING OF REMOTE DEPOSITIONS OF EXPERTS**

Provider Plaintiffs and Defendants (“the Parties”) respectfully move for entry of the attached Stipulation and Proposed Order Governing the Taking of Remote Depositions of Experts. The Parties have met and conferred regarding the Stipulation and Proposed Order, which is designed to govern the taking of remote depositions of experts due to COVID-19. The Parties therefore request that the Court enter the Stipulation and Proposed Order.

Dated: November 3, 2020

Respectfully submitted,

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/s/ Craig A. Hoover

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I hereby certify that on November 3, 2020, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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